

Mr. William Raetz
Raetz Furniture, Inc.
1326 Franklin Street
Jasper, IN 47547-00001

Re: Exempt Construction and Operation Status,
037-13543-00001

Dear Mr. Raetz:

The application from Raetz Furniture, Inc., received on November 21, 2000, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following equipment to be located at 1326 Franklin Street, Jasper, Indiana, is classified as exempt from air pollution permit requirements:

One (1) spray booth, equipped with three (3) HVLP spray guns, as well as air-assisted airless spray guns, for finishing wood edges on laminate tops and finishing chair parts, using dry filters for overspray control.

The following conditions shall be applicable:

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

This exemption is the first air approval issued to this source.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

tlf

cc: File - Dubois County
Dubois County Health Department
Air Compliance -Ray Schick
Southwest Regional Office
Permit Administration & Development - Janet Mobley
Technical Support & Modeling-Michele Boner
Compliance Data Section-Karen Nowak

Indiana Department of Environmental Management (IDEM)
Office of Air Quality

Technical Support Document (TSD) for Exempt Emission Unit(s)

Source Background and Description

Source Name: Raetz Furniture, Inc.
Source Location: 1326 Franklin Street, Jasper, Indiana 47547
County: Dubois
Permit No.: 037-13543-00001
SIC Code: 2499
Permit Reviewer: Teresa Freeman

The Office of Air Quality (OAQ) has reviewed an application from Raetz Furniture relating to the construction and operation of the following equipment:

One (1) spray booth, equipped with three (3) HVLP spray guns, as well as air-assisted airless spray guns, for finishing wood edges on laminate tops and finishing chair parts, using dry filters for overspray control. Only one coating at a time will be used.

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Information, unless otherwise stated, used in this review was derived from the application and additional information supplied by the applicant.

A letter for the purposes of this review was received on November 21, 2000.

Emissions Calculations

See Appendix A of this document for detailed emissions calculations.

Potential to Emit

Pollutant	Potential Emissions	
	(lb/hr)	(ton/yr)
PM	0.128	0.56
SO ₂	0	0
VOC	0.48	2.1
CO	0	0
NO _x	0	0
Single HAP	0	0
Combination of HAPs	0	0

The potential VOC emissions before control are less than are less than 5 tons per year. Therefore, pursuant to 326 IAC 2-1.1-3(d), this modification is exempt.

County Attainment Status

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Dubois County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Dubois County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

Federal Rule Applicability

40 CFR Part 60 (New Source Performance Standard (NSPS))

There are no NSPS rules (40 CFR Part 60) applicable to the operation of the spray booth and spray guns.

40 CFR Part 63 (National Emission Standards for Hazardous Air Pollutants (NESHAPs))

There are no NESHAP rules (40 CFR Part 63) applicable to the operation of the the spray booth and spray guns, since potential emissions of a single HAP is less than 10 tons per year and potential emissions of any combinations of HAPs are less than 25 tons per year.

State Rule Applicability

326 IAC 5-1-2 (Visible Emission Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 8-2-12 (Surface Coating)

This rule applies to new facilities as of July 1, 1990, that have actual emissions of greater than fifteen (15) pound of VOC per day before add-on controls. It does not apply to the source, because PTE is less than 15 pounds per day before add-on controls.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Quality (OAQ) Construction Permit Application Form Y. None of these listed air toxics will be emitted from this proposed construction.

Conclusion

The construction of this the spray booth and spray guns will be subject to the conditions of the attached proposed Exemption No. 037-13543, Plt ID No. 037-00001.